

FEDERAL BUREAU OF INVESTIGATION

REGULATORY INSPECTION REPORT (18 USC 2257)

OF

**Robert Hill Releasing Company
21598 Marilla St.
Chatsworth, CA 91311**

Date of Re-Inspection: 03/21/2007

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REGULATORY INSPECTIONS REPORT

Report of: SSA Charles R. Joyner,
2257 Regulatory Inspections Unit, Crimes Against Children Unit,
Violent Crimes Section, Criminal Investigative Division
Report Date: 04/30/2007
File Number: [REDACTED] (F) -Robert Hill2

PRODUCER INFORMATION

A re-inspection was conducted of Robert Hill Releasing Company pursuant to Title 18 United States Code Section 2257 and 28 Code of Federal Regulations Part 75. The re-inspection was conducted at Robert Hill Releasing Company on 03/21/2007, at 21598 Marilla Street, Chatsworth, CA 91311. The initial inspection of Robert Hill Releasing Company was conducted on 08/01/2006. Several violations remained unresolved from the first inspection, creating a need for the re-inspection. [REDACTED], owner of Robert Hill Releasing Company, office telephone number (800)977-3866, fax number (818)763-6118, and [REDACTED] the Custodian of Records for Robert Hill Releasing Company, were present during the re-inspection.

INSPECTION SUMMARY

DVDs produced by Robert Hill Releasing Company were ordered from the internet. Contract inspectors reviewed 11 DVDs in addition to the 11 DVDs reviewed from the first inspection (22 total) and identified all performers by stage name or by still photographs taken from the video. All videos reviewed contained the required 2257 information in the proper format. A total of 107 were identified as appearing in the 11 DVDs, and 89 performers were previously identified as appearing in the 11 DVDs from the first inspection. Prior to the inspection, contract inspectors printed several still photographs of each performer's face from different camera angles. During the inspection, the still photographs were compared with the performer identification on record to ensure the identification was, in fact, of that performer.

After the re-inspection on 03/21/2007, it was determined Robert Hill Releasing Company had several 2257 violations, including identical violations from the first inspection on 08/01/2006. Pre-existing violations which were not resolved at the initiation of the re-inspection included: No photo identification was available for [REDACTED] (P-1) [REDACTED] no photo identification was available for [REDACTED] (P-1) and the cross reference system was not up-to-date. New violations included the following: No photo identification was available for the entire cast of two separate movies, production dates were inaccurately reflected or missing from two movies, photo identification was missing for two additional performers, and photo identification for four performers was illegible. Details of these violations are listed in the findings section of this report. Copies of available pertinent

records were made by the inspection team.

During this inspection, all provisions of 18 USC 2257 guidelines were followed by the inspection team.

FINDINGS

Unresolved Violations from Initial Inspection upon Initiating Re-Inspection

1. No identification records were present for performer (P-1) appearing in "Teenage Asian Transsexuals #2."

2257 (c) – "Any person to whom subsection (a) applies shall maintain the records required by this section at his business premises..."

28 CFR Part 75.4 – "Any producer required by this part to maintain records shall make such records available at the producer's place of business."

2. No identification records were present for performer (P-1) who appeared in "Summer Girls...and Some Are Not."

2257 (c) – "Any person to whom subsection (a) applies shall maintain the records required by this section at his business premises..."

28 CFR Part 75.4 – "Any producer required by this part to maintain records shall make such records available at the producer's place of business."

3. A cross reference system had been implemented, but was not updated.

28 CFR Part 75.3 - "Records required to be maintained under this part shall be categorized and retrievable to: All name(s) of each performer, including any alias, maiden name, nickname, stage name or professional name of the performer; and including the title, number, or other similar identifier..."

"Only one copy of each picture of a performer's picture identification card and identification document must be kept as long as each copy is categorized and retrievable according to any name, real or assumed, used by each performer, and according to any title or other identifier of the matter."

28 CFR 75.2(a)(3) – Records are to be organized alphabetically and cross-referenced to each alias or other name used and to each title.

New Findings

1. No photo identification records were maintained on the premises for "Some Are Girls#6...and Some Are Not."

2257 (c) – "Any person to whom subsection (a) applies shall maintain the records required by this section at his business premises..."

28 CFR Part 75.4 – "Any producer required by this part to maintain records shall make such records available at the producer's place of business."

2. No photo identification records were maintained on the premises for "Teenage Asian Transsexuals #2."

2257 (c) – "Any person to whom subsection (a) applies shall maintain the records required by this section at his business premises..."

28 CFR Part 75.4 – "Any producer required by this part to maintain records shall make such records available at the producer's place of business."

3. No cross referencing had been done for the following movie titles:

- a. "Blowjobs Across Los Angeles #2"
- b. "Khatoey the 3rd Sex"
- c. "My Dream Girl #2"
- d. "Pile Driver"
- e. "Summer Girls... and Some Are Not"
- f. "Teenage Asian Transsexuals #2"
- g. "Blowjobs Across Los Angeles"
- h. "T-Girls Gone Wild"

28 CFR 75.6(b) – "Every statement shall contain...the date of production, manufacture, publication, duplication, reproduction, or reissuance of the matter..."

4. Production dates were inaccurately reflected or missing on the DVDs for the following titles:

- a. "Pussy Wreckers"
- b. "Rim of the World II"
- c. "Transsexual Lesbians"
- d. "T-Girls Gone Wild"
- e. "She Stuffed a Dildo Up My Ass"
- f. "Blowjobs Across Los Angeles #1"
- g. "Lesbian Assholes"
- h. "Transamore #15"

28 CFR 75.6(b) – "Every statement shall contain...the date of production, manufacture, publication, duplication, reproduction, or reissuance of the matter..."

5. No photo identification was available for (P-1) appearing in "Pussy Wreckers."

2257 (c) – "Any person to whom subsection (a) applies shall maintain the records required by this section at his business premises..."

28 CFR Part 75.4 – "Any producer required by this part to maintain records shall make such records available at the producer's place of business."

6. In "Blowjobs Across Los Angeles #1,"

- a. No photo identification was available for (P-1)
- b. Photo identification for (P-1) was illegible
- c. Photo identification for (P-1) did not contain a date of birth

- d. Photo identification for (P-1) was illegible
- e. Photo identification for (P-1) was illegible
- f. The date of birth for (P-1) was illegible

2257 (c) – “Any person to whom subsection (a) applies shall maintain the records required by this section at his business premises...”

28 CFR Part 75.4 – “Any producer required by this part to maintain records shall make such records available at the producer’s place of business.”

28 CFR Part 75.2 - “...the records shall also include a legible copy of the identification document examined and, if that document does not contain a recent and recognizable picture of the performer, a legible copy of a picture identification card.”

7. In “T-Girls Gone Wild,” no photo identification was available for an unknown white male in Scene #2 who was identified by (P-1)

2257 (c) – “Any person to whom subsection (a) applies shall maintain the records required by this section at his business premises...”

28 CFR Part 75.4 – “Any producer required by this part to maintain records shall make such records available at the producer’s place of business.”

8. In “Rim of the World II,” the photo identification for (P-1) is illegible
- 28 CFR Part 75.2 - “...the records shall also include a legible copy of the identification document examined and, if that document does not contain a recent and recognizable picture of the performer, a legible copy of a picture identification card.”

Producer Response to Findings:

(Recurring Violations)

1. Photo identification was later provided for (P-1)

2. The photo identification on record for (P-1) was of a (P-1). (P-1) The inspector believed (P-1) is not the same individual as (P-1). In discussions with Robert Hill Releasing Company staff during the first inspection, it was admitted that they are indeed two separate people and the correct photo identification was not on file for (P-1). In addition, the inspectors were initially advised (P-1) was someone who “walked off the street” to be in the film and no identification may have been obtained.

A comparison of Artist Agreement and Release forms indicate forms pertaining to (P-1) (the two other performers appearing in the scene with (P-1) appear to be identical. The form for (P-1) was of different font and size, and the signature appeared suspicious. Numerous other differences were noted indicating the form for (P-1) was completed at a different time.

In a phone call from (P-1) after the re-inspection, he advised he also didn’t believe (P-1) said he would attempt to determine (P-1) true name and obtain the proper photo identification. (P-1)

appears to be well over 18 years older.

2. Robert Hill Releasing Company made significant improvements in its cross reference system, but it was not up-to-date at the time of the re-inspection.

(New Violations)

1. Adequate photo identification was provided for all performers in "Summer Girls #6..and Some Are Not."
2. Adequate photo identification was provided for all performers in "Teenage Asian Transsexuals #2."
3. [REDACTED] demonstrated he is continuously updating the cross reference system.
4. After discussing the possible remedies to movies containing incorrect production dates with the Assistant United States Attorney's Office, it was determined that if documentation is maintained clearly showing the correct production dates, no charges would be filed for this particular violation. Robert Hill Releasing Company does maintain records indicating actual production dates.
5. Adequate photo identification was provided for [REDACTED] (P-1)
6. Adequate photo identification was provided for performers appearing in "Blowjobs Across Los Angeles #1."
7. No correct photo identification was provided for [REDACTED] (P-1)
8. Adequate photo identification was provided for [REDACTED] (P-1)

It was discovered a DVD reviewed by an inspector was labeled as "The Negro in Mrs. Jones 2," the DVD jacket was labeled as "The Negro in Mrs. Jones 2," but the movie was in fact "The Negro in Mrs. Jones 1." This was a warehouse error and is not a 2257 violation.

PRE-INSPECTION PROCEDURES

The following Pre-Inspection Procedures were followed:

1. Robert Hill Releasing Company was selected for re-inspection at the request of the Los Angeles United States Attorney's Office (USAO). The USAO requested Robert Hill Releasing Company be re-inspected because violations remained unresolved from the initial inspection.
2. A sample of Robert Hill Releasing Company DVDs was ordered and the method of purchase was documented and maintained in a 1A envelope with the case file.
3. All products ordered were reviewed for 18 USC 2257 compliance and a pre-inspection analysis was conducted for each of the DVDs ordered.
4. All performers depicted in the videos engaging in sexually explicit conduct were identified by either a stage name or by still photographs of their likeness taken from the video.

INSPECTION PROCEDURES

The following Inspection Procedures were followed:

1. Inspection began at 9:30 a.m. during regular business hours.
2. SSA Charles Joyner, the Lead Inspector, immediately identified himself and the purpose of the inspection upon entering Robert Hill Releasing Company.
3. SSA Joyner explained the nature and purpose of the inspection, including the limited nature of the records inspection.
4. SSA Joyner provided Lynton Appleson with a letter advising Robert Hill Releasing Company could be re-inspected at any time if violations are discovered. [REDACTED] also confirmed he had received a letter by Federal Express advising the company they were subject to re-inspection at any time.
5. Digital photographs were taken of the business and the room used to store 2257 information prior to the inspection.
6. Inspectors reviewed the 18 USC 2257 records maintained by Robert Hill Releasing Company for the 22 videos reviewed (11 on the initial inspection and 11 on the re-inspection) to include the performers appearing therein.
7. Copies were made of the selected performers' identifications indicating date

of birth.

8. The inspection concluded at 11:30 a.m.
9. Digital photographs were taken of the room used to store 2257 information prior to the inspectors departing the place of business.

ROBERTHILL2.XLS

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VIDEO	PROD. DATE	PERFORMER NAME	DOB	TRUE NAME
BLOW JOBS ACROSS LA VOL 1	10/25/2005	(P-1)		
BLOW JOBS ACROSS LA VOL 1				
BLOW JOBS ACROSS LA VOL 1				
BLOW JOBS ACROSS LA VOL 1				
BLOW JOBS ACROSS LA VOL 1				
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BLOW JOBS ACROSS LA VOL 1				
BLOW JOBS ACROSS LA VOL 1				
BLOW JOBS ACROSS LA VOL 1				
BLOW JOBS ACROSS LA VOL 1				
LESBIAN ASSHOLES	Jun-05			
LESBIAN ASSHOLES				
LESBIAN ASSHOLES				
LESBIAN ASSHOLES				
LESBIAN ASSHOLES				
LESBIAN ASSHOLES				
LESBIAN ASSHOLES				
LESBIAN ASSHOLES				
LESBIAN ASSHOLES				
LESBIAN ASSHOLES				
PUSSY WRECKER	9/1/2004			
PUSSY WRECKER				
PUSSY WRECKER				
PUSSY WRECKER				
PUSSY WRECKER				
PUSSY WRECKER				
PUSSY WRECKER				
PUSSY WRECKER				

SUBJECT TO PROTECTIVE ORDER

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VIDEO	PROD. DATE	PERFORMER NAME	DOB	TRUE NAME
T-GIRLS GONE WILD		(P-1)	(P-1)	(P-1)
T-GIRLS GONE WILD				
T-GIRLS GONE WILD				
T-GIRLS GONE WILD				
T-GIRLS GONE WILD				
T-GIRLS GONE WILD				
T-GIRLS GONE WILD				
T-GIRLS GONE WILD				
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T-GIRLS GONE WILD				
T-GIRLS GONE WILD				
T-GIRLS GONE WILD				
THE NEGRO IN MRS. JONES 2	6/14/2002	(P-1)		ACTORS RECORDS NOT REVIEWED AT
THE NEGRO IN MRS. JONES 2				ROBERT HILL RELEASING CO. ON 3/21/07
THE NEGRO IN MRS. JONES 2				BECAUSE PRODUCER HAD MISIDENTIFIED
THE NEGRO IN MRS. JONES 2				THE DVD ON THE DVD JACKET AND ON
THE NEGRO IN MRS. JONES 2				THE DVD LABEL.
THE NEGRO IN MRS. JONES 2				
THE NEGRO IN MRS. JONES 2				
THE NEGRO IN MRS. JONES 2				
TRANS AMORE 15	7/1/2005	(P-1)		(P-1)
TRANS AMORE 15				
TRANS AMORE 15				
TRANS AMORE 15				
TRANS AMORE 15				
TRANS AMORE 15				
TRANS AMORE 15				
TRANS AMORE 15				

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RECORDS VERIFICATION SPREADSHEET

(Robert Hill Re-Inspection of 03/21/2007)

Robert Hill Releasing Company

[illegible]

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Robert Hill Releasing Company

VIDEO	PROD. DATE	PERFORMER NAME	DOB	TRUE NAME
PILE DRIVER	3/25/2004			
PILE DRIVER				
PILE DRIVER				
PILE DRIVER				
PILE DRIVER				
PILE DRIVER				
PILE DRIVER				
PILE DRIVER				
SUMMER GIRLS 6	8/17/2002			
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS AND SOME ARE NOT	6/8, 7/9, & 7/29/99			
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
TEENAGE ASIAN TRANSEXUAL 2	3/6/2006			
TEENAGE ASIAN TRANSEXUAL 2				
TEENAGE ASIAN TRANSEXUAL 2				
TEENAGE ASIAN TRANSEXUAL 2				
TEENAGE ASIAN TRANSEXUAL 2				
TEENAGE ASIAN TRANSEXUAL 2				
TEENAGE ASIAN TRANSEXUAL 2				
TEENAGE TRANSEXUAL NURSES 2	11/29/2002			
TEENAGE TRANSEXUAL NURSES 2				
TEENAGE TRANSEXUAL NURSES 2				
TEENAGE TRANSEXUAL NURSES 2				
TEENAGE TRANSEXUAL NURSES 2				
TEENAGE TRANSEXUAL NURSES 2				
TEENAGE TRANSEXUAL NURSES 6	5/20/2005			
TEENAGE TRANSEXUAL NURSES 6				
TEENAGE TRANSEXUAL NURSES 6				
TEENAGE TRANSEXUAL NURSES 6				
TEENAGE TRANSEXUAL NURSES 6				
TEENAGE TRANSEXUAL NURSES 6				

(P-1)

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Robert Hill Releasing Company

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PHOTO LOG/PHOTOS

CAMERA Nikon Coolpix 990

LENS - Normal - N

FILM : ASA Digital

Wide - W

ROLL No. _____

Macro - M

Tele. - T

LIGHT - Available - A
Elec. Strobe - E
Flashbulb - F

Photo No. | Lens | Light | SS | f - stop | Description | Photo Log Sketch

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REMARKS

SUBJECT TO PROTECTIVE ORDER

FBI 001510

INSPECTION COMPLIANCE DETERMINATION

Robert Hill Releasing Company was found **NOT** to be in compliance with 18 USC 2257 and 28 CFR 75.